

ALLEN WINDRIM, Pro Se	:	UNITED STATES BANKRUPTCY COURT
Debtor	:	EASTERN DISTRICT OF PENNSYLVANIA
	:	
	:	
	:	Bankruptcy No. 18-16016JKF
	:	Chapter 13
	:	

DEBTORS OBJECTION TO THE OBJECTION OF WILMINGTON TRUST, NATIONAL ASSOCIATION,
NOT IN ITS INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE FOR MFRA TRUST 2016-1 TO
CONFIRMATION OF CHAPTER 13 PLAN

AND NOW, comes Debtor, Allen Windrim, and files the within Answer's and allege as follows:

1. Debtor, is Pro Se and is currently preparing an Objection in response to the filed motion, but requires more time in order to properly file an Objection.
2. Debtor is clear and certain that the charges that have been reported by Wells Fargo are unfair, unreasonable, unfair, excessive and have been unsubstantiated for over seven years and Debtor intends to support the same in his Objection.
3. Debtor, had a successful meeting with attorney Polly Langdon, on the 18th January 2019, during the meeting of the creditors and was provided with a detailed list of deficiencies' with the filed plan and informed Ms. Langdon that an amended plan will be filed.
4. Debtor, has also meet with an attorney, at the meeting room, after the meeting of creditors, and was advised that a response and/or Objection to the filed motion is suggested and/or required; whereas, Debtor was unaware that a written response was required at all and assumed that a verbal response would be on the record at the upcoming scheduled hearing date, since one was already, currently established.
5. Debtor, is aware of the mistake made in this instance and is currently preparing an Objection and anticipates to address all noted objections clearly and accurately anticipate to satisfy the Honorable court. Unfortunately, Debtor is without sufficient time trying to go back seven years to prepare and defend.
6. Debtor, respectfully requests this Honorable Judge to issue a continuance to the hearing scheduled for the 13th February, 2019 at 9:30 a.m.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Objection To The Objection Of Wilmington Trust, National Association, Not In Its Individual Capacity, But Solely As Trustee For Mfra Trust 2016-1 To Confirmation Of Chapter 13 Plan, were served on this 28th day of January, 2019, by hand 1st class mail to the court and attorney for the trustee, upon those listed below:

U.S. Bankruptcy Court

Clerk's Office

United States Courthouse

900 Market Street

Philadelphia, PA 19107

&

Polly Langdon, Esq.

for William Miller, Esq.

Interim Chapter 13 Trustee

2901 St. Lawrence Avenue, Suite 100

Reading, PA 19606

/s/: Allen Windrim
Allen Windrim, Pro Se,
Debtor

Dated: 28th January 2019